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May 4, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte Notice*
PS Docket No. 10-255

Dear Ms. Dortch:

Pursuant to 1.1206 of the Commission's rules, L.R. Kimball is electronically filing this *Ex Parte* in the docket referenced above. This letter is notice to the Commission that L.R. Kimball met with FCC staff on May 3, 2011 at the FCC offices in Washington D.C. in order to discuss L.R. Kimball's comments in response to the *Notice of Inquiry* adopted by the Commission on December 21, 2010, in the matter of Framework for Next Generation 911 Deployment. Joel McCamley, Gordon Vanauken, Robert Wentzel and Wendy Day represented L.R. Kimball at the meeting and gave the attached presentation to FCC staff. FCC attendees included David Furth, Dave Siehl, Tim May, Aaron Garza, Stan Scheiner, Jerry Stanshine (participating via phone), Henning Schulzrinne and Patrick Donovan.

L.R. Kimball presented the attached presentation to FCC staff. The presentation responds to questions posed to L.R. Kimball by FCC staff prior to the meeting. The presentation is formatted in response to each question.

L.R. Kimball's goal for the meeting was to effectively respond to the FCC's questions and to share information on the status of current 911 systems, the status of NG911 deployment throughout the country, state and local perspectives on NG911 and potential impediments to the deployment of NG911. L.R. Kimball indicated that there is no specific approach to the national deployment of Next Generation 911 (NG911) that L.R. Kimball advocates.

During the meeting, a conversation ensued regarding approximate estimates of the amount of 911 surcharges that states collect and the fact that those collections do not cover the budgetary needs of local 911 authorities. L.R. Kimball offered that some of the potential reasons for that shortfall include lack of pre-paid collection and differing definitions of 911.

The regulatory hurdles that have the potential to impede NG911 deployment were discussed during the meeting. Hurdles include dated statutes that refer to older technologies and bundled tariffs that prohibit a-la-carte services and competition. L.R. Kimball indicated that the Commission could likely help to resolve the regulatory issues by creating a regulatory framework for NG911 deployment that states could use as model.

L.R. Kimball shared its knowledge of local 911 authorities' concerns with regard to NG911 including how NG911 will impact call taking due to the large number of new applications and technologies that would be available with NG911.

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The meeting ended with a conversation about the immediate need for network infrastructure and the pros and cons of repurposing or multipurposing existing networks for 911 use given the priority access that 911 requires.

Sincerely,

/s/ Joel McCamley

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Discussion Points

PS Docket # 10-255

Presented by L.R. Kimball to FCC Staff

May 3, 2011

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What do you see as a minimal specification of interfaces or capabilities that would allow interoperability?

- Must be open and flexible standards based
- Session Initiation Protocol (SIP)
- SIP Location Conveyance (PIDF-Lo)
- Specify Minimum Media stream types

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What is the typical communication-related budget for an E911 PSAP? (Both dollar figures and components or estimates of relatives size would be helpful.)

- This would be very difficult to develop
- Each state, 9-1-1 Authority, and PSAP will measure this differently
- Need to develop list of costs then determine this , for example:
  - Equipment (Which?)
  - Staffing
  - Service
- This has impacted the usefulness of cost data collected in the past

Do PSAPs typically contract with a single entity (SSP, say) for all 911 communication services or work more a-la-carte?

- Current
  - Generally Single provider (Legacy Provider) for 9-1-1 Service
  - Occasionally Separate Entity for ALI
  - Still pay legacy providers to deliver calls to 9-1-1 in some cases
  - There is still bundling in some tariffs
- Future
  - Potentially A-la-carte
  - Will still have 9-1-1 entities that like a single provider

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Could there be multiple ESInets that serve a single PSAP, e.g., provided by competing organizations or companies?

- Probably not at the PSAP level

- The concept of NG9-1-1 pushes much of the functions to the ESInet. Multiple ESInets to the PSAP will require PSAPs to add switching capabilities.

- PSAPs may have other systems and possibly sub-networks to Secondary and response agencies.

Are state IP-based networks (e.g., similar to the ones maintained in Florida and Oregon) suitable as ESInets? Do you know how common they are?

- As they stand today probably not as they are currently configured. The systems are generally purpose built networks.

- All states have some form of network, usually multiple networks (Courts, NCIC, Motor vehicle, State agencies)

- Potential for these existing networks to be combined and added to an ESInet, or serve as secondary route networks.

Do you have advice or sources of data for estimating NG911 costs?

- Request for Information (RFI)

- Pricing today may not be accurate
  - New technology
  - Few adopters
  - Entry Pricing

In your comments, you state that "the industry needs to be incentivized or required to develop devices and/or technology that provide the accuracy needed to properly route calls." Could you please provide specific details about how this can be accomplished?

- Location information is very important to 9-1-1. With the technologies of today becoming more unbundled, devices and applications need to become more location aware

- Much of the conversation from the providers has been on why they can not provide location. Some ideas may be:
  - Require it for type acceptance
  - Require it to receive USF distributions
  - Tie it to licenses for wireless

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In your comments, you state that "the industry needs to continue to improve location accuracy within buildings. Future location technologies should provide elevation information to locate the caller in a multi-story building." Specifically, what would you suggest the Commission do to improve location accuracy within buildings? What location technologies do you envision providing elevation information?

- The industry will build based on the requirements of today. If these requirements are loose, the industry may not work toward more accuracy.
- Direction to the industry to work toward accuracy and additional data elements to include room, floor, and/or elevation
- This will need to apply to all devices and applications to include MLTS.
- There are some technologies available.
- Possibly tie to in-building amplifiers?